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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
OPPOSITION TO DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S PRECIS IN
SUPPORT OF REQUEST TO FILE
MOTION IN LIMINE TO EXCLUDE
TESTIMONY AND OPINIONS OF
WAYMO EXPERT LAMBERTUS
HESSELINK ON TS 25**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo's Administrative Motion to File Under
7 Seal Portions of Its Opposition to Defendants Uber Technologies, Inc. and Ottomotto LLC's Precis in
8 Support of Request to File Motion in Limine to Exclude Testimony and Opinions of Waymo Expert
9 Lambertus Hesselink on TS 25 ("Waymo's Opposition"), filed concurrently herewith (the
10 "Administrative Motion"). The Administrative Motion seeks an order sealing the following materials
11 filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo's Opposition	Highlighted Portions	Waymo (green highlighting); Defendants (blue highlighting)

16 3. Specifically, the portions of Waymo's Opposition identified in the table above as
17 designated by Waymo contain or refer to trade secret information, which Waymo seeks to seal.

18 4. The portions of Waymo's Opposition identified in the table above contain, reference,
19 and/or describe Waymo's trade secrets. The information Waymo seeks to seal includes the
20 confidential design and functionality of Waymo's proprietary autonomous vehicle system, including
21 its technical specifications and/or LiDAR designs, which Waymo maintains as secret. I understand
22 that these trade secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are
23 valuable to Waymo's business (Dkt. 25-31). The public disclosure of this information would give
24 Waymo's competitors access to descriptions of the functionality or features of Waymo's autonomous
25 vehicle system. If such information were made public, I understand that Waymo's competitive
26 standing would be significantly harmed.
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